

## REMARKS

The pending application contains claims 3-4, 8-13, 15-16, 19 and 21-36. In view of the following remarks, Applicant respectfully requests allowance of the application.

Claims 3-4, 8-13, 15-16, 19, and 21-36 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,134,527 to Meunier et al. and claims 12, 19, 24, and 30 stand rejected under 35 U.S.C. §103(a) as unpatentable over Meunier et al. in view of U.S. Patent No. 4,275,266 to Lasar.

Independent claim 21 recites several elements that are not found in the cited art. It defines a table that includes an execution command and a plurality of candidate audio commands. Each candidate audio command is compared with each audio command previously stored in a speech menu and, if all the accuracy values for a candidate audio command exceed a predetermined value, the candidate audio command is added to the speech menu. Independent claims 8, 13, 26, and 35 also define a predetermined table of sound commands where an accuracy value is determined and used to assign a candidate command to a speech menu.

In contrast, Meunier et al. discloses a method, which requires two steps: 1) "training of a model of the word" and 2) "analysis of the new word for similarity to existing vocabulary words." See Meunier et al. at column 3, lines 10-12. While Meunier et al. appears to disclose a database of multiple repetitions of a word to be *trained*, this is not the predetermined table of sound commands claimed by Applicant. Applicant's independent claims refer to predetermined tables, which may be pre-defined commands published by independent software vendors. Therefore, unlike Meunier et al., the method of the present invention operates without the required speaker training of Meunier et al.

In addition, Applicant submits that Lasar does not correct the deficiencies of Meunier et al. Lasar is cited as disclosing "control of a machine or a device via tones." See Office Action dated June 4, 2001, page 3. Lasar appears to disclose a method of inputting sounds and calculating a digital output. However, Lasar does not disclose the claimed predetermined table of sound commands. Nor does Lasar disclose

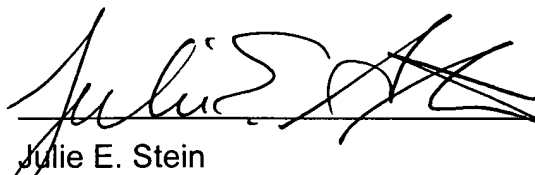
determining whether all of the accuracy values for a candidate audio command exceed a predetermined value and adding the candidate audio command to a speech menu if the accuracy values do exceed the predetermined value.

Therefore, independent claims 8, 26, 13, 21, 26, and 35 are allowable over Meunier et al. alone or in combination with Lasar, as are dependent claims 3-4, 9-12, 15-16, 19, 22-25, 27-34, and 36 at least by virtue of their dependency and additional recitations.

Applicant respectfully requests allowance of the application.

Respectfully submitted,

Date: August 6, 2001

  
Julie E. Stein  
Registration No. 43,158

KENYON & KENYON  
1500 K Street, NW, Suite 700  
Washington, D.C. 20005  
Phone: (202) 220-4200  
Fax: (202) 220-4201  
jstein@kenyon.com